

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

Audrey Petie Davis
Plaintiff

v.

NEW AMERICAN FUNDING
Defendant,

FILED
HARRISBURG, PA

JUN 26 2025

PER  CLERK

Civil Action NO: 1:25-CV-690-PJC

DECLARATION CLARIFYING SCOPE OF AMENDED
COMPLAINT

Filed in Support of Judicial Efficiency and to
Prevent Unnecessary Delay)

I, Audrey Petie Davis, hereby Declare under
Penalty of Perjury the following;

1. I am the Plaintiff and Authorized Representative in the Above Captioned matter and the individual who submitted the Motion to Amend Complaint Previously Filed on or about June 23, 2025
2. I submitted this Declaration solely to Clarify that my Motion to Amend Complaint was limited in scope and did not introduce any new Factual Allegations, Claims, Causes of Action, or additional Parties. THE PURPOSE of THE Amendment was to substitute myself as the named Plaintiff, in Place of my mother Maryam Butler, for

Clarity of standing and direct representation.

3. All claims, facts, and supporting exhibits originally filed remain unchanged. No new counts were asserted, and all issues previously raised for litigation remain fully preserved without expansion or withdrawal.


4. This clarification is provided in good faith to ensure judicial clarity and to preempt any unnecessary procedural objections or ~~misrepresentation~~ ^{misrepresentation} by defense counsel regarding the intent or effect of the amended pleading.

5. This Declaration is intended to streamline proceedings and affirm that no undue burden or prejudice arises from the amendment, and that Defendant was already aware of all operative facts, exhibits and legal issues as presented in the original Complaint.

I respectfully submit this for the Court's awareness and incorporation into the official record.

Verification

I Audrey Petie Davis declare under Penalty of Perjury under the laws of the United States that the foregoing Declaration is true and correct to the best of my knowledge, information, and belief.

Executed on June 26, 2025
Audrey P. 
Audrey Petie Davis

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2025, I served a true and correct copy of the foregoing Declaration Clarifying Scope of Amended Complaint on the following counsel of record via email.

James McNally
jmcnally@cohenseglia.com

Audrey Petie Davis
Audrey P. Davis